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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:16-cr-00114-JAD-GWF
)	
)	<u>STIPULATION TO CONTINUE</u>
Plaintiff,)	<u>RESPONSE TO OBJECTIONS TO</u>
)	<u>REPORT AND RECOMMENDATION</u>
v.)	
)	
RAMSEY HILL,)	(First Request)
)	
Defendant.)	
)	

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United States Attorney, and Alexandra M. Michael, Assistant United States Attorney, counsel for the United States of America, and Rebecca Levy, Assistant Federal Public Defender, counsel for defendant RAMSEY HILL, that the deadline to file a response to Objections to Report and Recommendation [Dkt. #45] currently due on January 23, 2017 be continued to January 27, 2017.

This Stipulation is entered into for the following reasons:

1 1. The additional time requested is not sought for the purpose of delay, but to allow
2 counsel for the Government, Alexandra Michael, sufficient time to review the transcript of the
3 proceedings for the Motion to Suppress that was obtained on January 20, 2017.
4

5 2. The Defendant is incarcerated, and he does not object to the continuance.

6 3. Counsel for the Defendant does not object to the continuance.

7 4. Additionally, denial of this request for continuance could result in a miscarriage
8 of justice.
9

10 5. The additional time requested by this Stipulation is excludable in computing the
11 time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,
12 United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States
13 Code, Sections 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).
14

15 7. This is the first request for a continuance filed herein.

16 DATED: January 23, 2017.
17

18 _____
19 /s/
20 ALEXANDRA M. MICHAEL
21 Assistant United States Attorney
22 Counsel for the United States

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19 /s/
20 REBECCA LEVY
21 Assistant Federal Public Defender
22 Counsel for Defendant RAMSEY HILL
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:16-cr-00114-JAD-GWF
)	
)	<u>FINDINGS OF FACT, CONCLUSIONS</u>
Plaintiff,)	<u>OF LAW, AND ORDER</u>
)	
v.)	
)	
RAMSEY HILL,)	
)	
Defendant.)	
)	

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The additional time requested is not sought for the purpose of delay, but to allow counsel for the Government, Alexandra Michael, sufficient time to review the transcript of the proceedings hearing for the Motion to Suppress that was obtained on January 20, 2017.

2. The Defendant is incarcerated, and he does not object to the continuance.

3. Counsel for the Defendant does not object to the continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Sections 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).

7. This is the first request for a continuance filed herein.

ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, **IT IS HEREBY ORDERED**, that the deadline to file a Response to Objections to Report and Recommendation [Dkt. #45] is continued to January 27, 2017.

DATED this 23rd day of January, 2017.


UNITED STATES DISTRICT JUDGE